



Patrick W. Turner
General Attorney-South Carolina
Legal Department

AT&T South Carolina
1600 Williams Street
Suite 5200
Columbia, SC 29201

T: 803.401-2900
F: 803.254.1731
pt1285@att.com
www.att.com

June 10, 2014

The Honorable Jocelyn Boyd
Chief Clerk of the Commission
Public Service Commission of South Carolina
Post Office Drawer 11649
Columbia, South Carolina 29211

Re: AT&T South Carolina's Petition to Withdraw Funds from the State USF to
Support Stand-Alone Basic Residential Lines Pursuant to S.C. Code Ann. §58-9-
576(C)(9)(c)
Docket No. 2011-406-C

Dear Ms. Boyd:

Enclosed for filing is the verified testimony of AT&T South Carolina witnesses Kenneth Minzenberger, Joseph Blount, and Ronald Hilyer.

The testimony supports the Joint Proposal of AT&T South Carolina and the Office of Regulatory Staff that was filed in this docket earlier today.

By copy of this letter, I am serving all parties of record with a copy of this testimony as indicated on the attached Certificate of Service.

Sincerely,

A handwritten signature in black ink that reads "Patrick W. Turner". The signature is written in a cursive, flowing style.

Patrick W. Turner

PWT/nml
Enclosure
cc: All Parties of Record
1107947

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AT&T SOUTH CAROLINA’S
VERIFIED DIRECT TESTIMONY OF KENNETH E. MINZENBERGER
BEFORE THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2011-406-C
JUNE 10, 2014

Q. PLEASE STATE YOUR NAME, YOUR EMPLOYER, AND YOUR
BUSINESS ADDRESS.

A. My name is Kenneth E. Minzenberger. I am employed by AT&T Services, Inc.
as an Area Manager – Public Policy. My business address is 1057 Lenox Park
Boulevard NE, Atlanta GA 30319.

Q. PLEASE PROVIDE A BRIEF DESCRIPTION OF YOUR BACKGROUND
AND EXPERIENCE.

A. I have been employed by AT&T Services, Inc. and its predecessor entities for
over 40 years. I have been in AT&T Services, Inc.’s Public Policy organization
since December 2006, and during that time I have been responsible for preparing
information that AT&T South Carolina submits annually to the South Carolina
Office of Regulatory Staff pursuant to various Orders the Commission has entered
in this docket and in Docket No. 1997-239-C.

1 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

2

3 A. On June 10, 2014, AT&T South Carolina and the Office of Regulatory Staff
4 (“ORS”) filed a Joint Proposal to equitably remedy overages in support from the
5 State Universal Service Fund (“State USF”) that AT&T South Carolina has
6 received. My testimony supports those aspects of the Joint Proposal that address
7 support from the State Universal Service Fund (“State USF”) that AT&T South
8 Carolina has sought and received for its stand-alone basic residential lines that
9 were in service as of October 1, 2009 and that remain in service (“grandfathered
10 stand-alone basic residential lines”).

11

12 Q. WHY ARE AT&T AND THE ORS SUBMITTING THIS JOINT PROPOSAL?

13

14 A. As explained in AT&T South Carolina’s prior submissions and in the
15 Commission’s November 12, 2013 Order (No. 2013-822) in this docket, AT&T
16 South Carolina has inadvertently sought and received overages in support from
17 the State USF for its stand-alone basic residential lines that were in service as of
18 October 1, 2009 and that remain in service (“grandfathered stand-alone basic
19 residential lines”).¹ The Commission ordered AT&T South Carolina to work with

¹ These are basic residential lines that: were in service on October 1, 2009; are still in service at the time of the request for support; and throughout that period have appeared on a billing account that does not also contain another service, feature, or product that is sold by an AT&T entity and billed on a recurring basis. *See* S.C. Code Ann. §58-9-576(C)(9)(c).

1 the Office of Regulatory Staff (“ORS”) and file a proposal for equitably
2 remedying any such overages. *See* Order No. 2013-822 at 2-3.

3
4 Q. WHAT REGULATORY FRAMEWORK APPLIES TO THE STATE USF
5 SUPPORT THAT AT&T SOUTH CAROLINA HAS SOUGHT FOR ITS
6 GRANDFATHERED, STAND-ALONE BASIC RESIDENTIAL LINES?

7
8 A. Section 58-9-576(C), under which AT&T South Carolina has been operating
9 since October 1, 2009. *See* AT&T South Carolina’s Notice of Election to Operate
10 Pursuant to S.C. Code Ann. §58-9-576(C), Non-Docketed Item (September 23,
11 2009).

12
13 Q. HOW MANY TIMES SINCE ELECTING TO OPERATE UNDER SECTION
14 58-9-576(C) HAS AT&T SOUTH CAROLINA SOUGHT STATE USF
15 SUPPORT FOR GRANDFATHERED STAND-ALONE BASIC RESIDENTIAL
16 LINES?

17
18 A. Three times – in requests filed on September 29, 2011, July 2, 2012, and July 1,
19 2013.² These requests, which are summarized in Exhibit KEM-1 to my
20 testimony, are the only requests at issue.

² AT&T South Carolina filed its first request on September 29, 2011 to comply with the statutory requirement to file such a request “prior to the end of the second year after the date that [AT&T South Carolina’s] election [to operate pursuant to Section 58-9-576(C)] becomes effective” S.C. Code Ann. §58-9-576(C)(9)(c). Subsequently, and consistent with the ORS’s request, the Commission established an annual deadline of

1

2 Q. IS THERE ANY ISSUE REGARDING STATE USF SUPPORT THE
3 COMMISSION GRANTED TO AT&T SOUTH CAROLINA PRIOR TO THE
4 THREE REQUESTS SUMMARIZED IN EXHIBIT KEM-1?

5

6 A. No. Section 58-9-576(C) applies only to companies who elect to operate under it.
7 Prior to the effective date of that election, the support an electing company could
8 draw from the State USF was governed by Commission Orders issued pursuant to
9 Section 58-9-280(E) and affirmed by the Supreme Court of South Carolina.³

10

11 Moreover, for the first two years following a company's election to operate under
12 Section 58-9-576(C), that company can receive from the State USF a statutorily-
13 designated percentage of the support it was receiving from the State USF under
14 Commission Orders issued pursuant to Section 58-9-280(E). *See* S.C. Code Ann.
15 §58-9-576(C)(9)(b).

16

17 After that two-year period, a company electing to operate under Section 58-9-
18 576(C) can receive State USF support based on: (a) its lines qualifying for
19 Lifeline support; and (b) its grandfathered stand-alone basic residential lines. *See*
20 S.C. Code Ann. §58-9-576(C)(9)(c), (d).

21

July 1 for AT&T South Carolina to file such requests. *See* Order No. 2011-865 in Docket No. 2011-406-C at 2 (January 17, 2012).

³ *See Office of Regulatory Staff v. South Carolina Public Serv. Comm'n*, 647 S.E.2d 223 (S.C. 2007).

1 As noted above, AT&T South Carolina elected to operate under Section 58-9-
2 576(C) effective October 1, 2009. Accordingly, only the three requests
3 summarized in Exhibit KEM-1 are at issue.
4

5 Q. HOW DID AT&T DETERMINE HOW MUCH SUPPORT TO SEEK IN THE
6 THREE REQUESTS SUMMARIZED IN EXHIBIT KEM-1?
7

8 A. As explained in prior submission in this Docket, AT&T South Carolina developed
9 a data query to identify all stand-alone basic residential lines in South Carolina as
10 of October 2009 (the “base month”). AT&T South Carolina ran the same query
11 to identify all stand-alone basic residential lines in South Carolina as of: July
12 2011 (the “data month” supporting the September 2011 request); December 2011
13 (the “data month” supporting the July 2012 request), and December 2012 (the
14 “data month” supporting the July 2013 request). In each request, AT&T South
15 Carolina sought support from the State USF only for lines that were identified
16 both in the query that was run on the October 2009 base month and the query that
17 was run on the “data month” supporting the request.
18

19 Q. DID THE RESULTS OF THOSE QUERIES (RUN ON THE “BASE MONTH”
20 AND ON EACH OF THE THREE “DATA MONTHS”) ACCURATELY
21 IDENTIFY THE STAND-ALONE BASIC RESIDENTIAL LINES IN SOUTH
22 CAROLINA AS OF EACH OF THOSE MONTHS?
23

1 A. No.

2

3 Q. HOW WAS THIS DISCOVERED?

4

5 A. As explained in prior submissions, AT&T South Carolina provided the ORS the
6 calculations supporting the amount it sought in its July 2013 request. At ORS'
7 request, AT&T South Carolina also provided ORS a sample of bills associated
8 with that request. ORS's review of that sample revealed a recurring charge for a
9 maintenance plan on one of those bills, which means that line does not meet the
10 statutory definition of a stand-alone basic residential line. ORS asked AT&T
11 South Carolina to re-visit its calculation of the number of lines for which it sought
12 State USF support in its July 2013 request and to adjust the amount of requested
13 support accordingly. AT&T South Carolina did so, and the Commission granted
14 the adjusted amount of support,⁴ but AT&T South Carolina subsequently
15 determined that even the adjusted amount of support is not accurate for the
16 reasons explained below.⁵

17

18 Q. PLEASE EXPLAIN WHY THE RESULTS OF THE QUERIES RUN ON EACH
19 OF THESE FOUR MONTHS (THE "BASE MONTH" AND EACH OF THE
20 THREE "DATA MONTHS") DID NOT ACCURATELY IDENTIFY THE

⁴ As explained below, AT&T South Carolina has received only a portion of the adjusted amount of support the Commission granted.

⁵ The Joint Proposal I address in this testimony takes this into account, and it proposes an equitable remedy for the overages in State USF Support that AT&T South Carolina has received as a result of its September 2011, July 2012, and July 2013 requests.

1 STAND-ALONE BASIC RESIDENTIAL LINES IN SOUTH CAROLINA AS
2 OF EACH MONTH.

3
4 A. In re-visiting its 2011 and 2012 requests as suggested by the ORS and as ordered
5 by the Commission, AT&T South Carolina discovered that, as a result of
6 miscommunications within AT&T, the queries that were run on the data for each
7 of these four months did not exclude accounts with the following characteristics
8 when identifying grandfathered stand-alone lines: long distance plans provided
9 by affiliates of AT&T South Carolina; additional lines; equipment maintenance
10 plans; certain call blocking services with monthly recurring charges; and DSL
11 services.

12
13 Q HOW DOES THE JOINT PROPOSAL TAKE THESE MISTAKES INTO
14 ACCOUNT?

15
16 A. AT&T South Carolina has manually reviewed the results of the queries that were
17 run on the three data months (July 2011, December 2011, and December 2012)
18 and has removed all non-qualifying lines from those results. Exhibit KEM-2
19 provides the resulting corrected number of stand-alone basic residential lines for
20 each data month and the amount of support that would apply if each of those lines
21 qualified for support (which, as explained below, is not the case).

1 Q. DO EACH OF THE STAND-ALONE BASIC RESIDENTIAL LINES
2 IDENTIFIED IN EXHIBIT KEM-2 QUALIFY FOR SUPPORT FROM THE
3 STATE USF?

4

5 A. No. As explained earlier in my testimony, only the lines identified in KEM-2 that
6 also were stand-alone basic residential lines in October 2009 qualify for support.

7

8 Q. DID AT&T DETERMINE WHETHER EACH OF THE STAND-ALONE
9 BASIC RESIDENTIAL LINES IDENTIFIED IN EXHIBIT KEM-2 WAS ALSO
10 A STAND-ALONE BASIC RESIDENTIAL LINE IN OCTOBER 2009?

11

12 A. No. The billing records from October 2009 that are necessary to make that
13 determination are available only in paper format, and manually reviewing those
14 paper billing records for the thousands of lines in Exhibit KEM-2 would take a
15 tremendous amount of time and resources.

16

17 Q. SO WHAT DID AT&T DO INSTEAD?

18

19 A. Instead of conducting such a burdensome manual review, and in consultation with
20 the ORS, AT&T South Carolina chose a statistically-valid random sample of the
21 17,850 stand-alone basic residential lines identified in the manual review of the
22 July 2011 query results. It then manually reviewed the October 2009 billing
23 records for each of the lines in that sample to determine if those lines actually

1 were stand-alone basic residential lines in October 2009. Each of those lines that
2 was not a stand-alone basic residential line in October 2009 was counted as an
3 “error.”

4
5 As explained in the testimony of AT&T South Carolina witness Joseph Blount,
6 AT&T South Carolina is 95% confident that if it had manually reviewed the 2009
7 billing records for all 17,850 lines identified in the manual review of the July
8 2011 query results, the actual error rate would have been between 5.52% and
9 9.34%.

10
11 Q. HOW DOES THE JOINT PROPOSAL TAKE THIS ERROR RATE INTO
12 ACCOUNT?

13
14 A. The Joint Proposal adjusts the figures in KEM-2 by the 9.34% error rate at the
15 high end of the 95% confidence interval.

16
17 Specifically, each of the line counts and the support amounts set out in Exhibit
18 KEM-2 has been reduced by 9.34% in order to determine the amount of State
19 USF support that should have been sought and granted for each of the past three
20 requests at issue.

21
22 The results of these calculations are set out in Exhibit KEM-3 to my testimony.

1 Q. BASED ON THESE CALCULATIONS, WHAT IS THE AGGREGATE
2 AMOUNT OF OVERAGE IN STATE USF SUPPORT THAT HAS BEEN
3 **GRANTED** TO AT&T SOUTH CAROLINA SINCE 2011?
4

5 A. \$708,352, as reflected in Exhibit KEM-4.
6

7 Q. DOES THAT MEAN AT&T SOUTH CAROLINA HAS ACTUALLY
8 RECEIVED \$708,352 OF STATE USF SUPPORT THAT IT SHOULD NOT
9 HAVE RECEIVED?
10

11 A. No. The \$708,352 figure is the aggregate overage in the amounts of support
12 AT&T South Carolina has been **granted** since October 2011, but AT&T South
13 Carolina has not yet received all of the support the Commission has granted.
14

15 As set forth in Exhibit KEM-4, AT&T has actually received a total of \$589,375 of
16 State USF Support that it should not have received (\$321,210 from its September
17 2011 Request, and \$268,165 from its July 2012 request).
18

19 In response to AT&T's July 2013 request, the Commission granted an adjusted
20 amount of \$628,749 of State USF support to AT&T South Carolina. Because this
21 support is paid out on a monthly basis, however, AT&T South Carolina has
22 actually received only \$209,583 of that amount (leaving a net of \$419,166 that
23 was awarded but has not yet been received by AT&T).

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Accordingly, as set forth in Exhibit KEM-5, the net of the \$708,352 aggregate overage in the amounts of support AT&T South Carolina has been granted since October 2011 and the \$419,166 of support that has been granted but not yet received is \$289,186.

Q. PLEASE SUMMARIZE THE ASPECTS OF THE JOINT PROPOSAL THAT ADDRESS THE MATTERS DESCRIBED IN YOUR TESTIMONY.

A. I defer to AT&T’s attorneys for any detailed discussion of the Joint Proposal. In general, however, to equitably remedy overages in support from the State Universal Service Fund (“State USF”) that AT&T South Carolina has received, AT&T and the ORS jointly propose:

- a. AT&T will not receive any of the \$419,166 of support that was awarded, but that it has not yet received, as a result of its adjusted July 2013 Request;
- b. AT&T will remit to the State USF \$312,207.44 (which includes principle and interest) to address the overage in support received that is set out in Exhibit KEM-5; and
- c. AT&T will not seek State USF support for grandfathered, stand-alone basic residential lines for the December 2014 to November 2015 State USF Fund year. Nothing prohibits AT&T from seeking State USF support for grandfathered, stand-alone basic residential

1 lines for the December 2015 to November 2016 State USF Fund
2 year or for subsequent State USF Fund years.

3

4 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

5

6 A. Yes.

7

SC PSC Docket No. 2011-406-C
Exhibit KEM-1

AT&T REQUESTS AND SUPPORT GRANTED
FOR GRANDFATHERED STAND-ALONE BASIC RESIDENTIAL LINES

Request Month	Data Month	Qualifying Lines		Support Granted	Order Granting Support
		Reported			
September 2011	July 2011	22,907	\$	1,112,111.42	2001-865 (January 2012)
July 2012	December 2011	19,909	\$	973,541.93	2012-661 (August 2012)
July 2013 (as adjusted)	December 2012	12,656	\$	628,748.88	2013-822 (November 2013)

SC PSC Docket No. 2011-406-C
Exhibit KEM-2

ACTUAL STAND-ALONE BASIC RESIDENTIAL LINES AND ASSOCIATED SUPPORT AMOUNTS
BASED ON MANUAL REVIEW OF QUERY RESULTS FOR THE THREE DATA MONTHS

Date of Request	Data Month	Stand-Alone Basic Residential Lines	Support if Each Line Qualified
September 2011	July 2011	17,850	\$ 872,382
July 2012	December 2011	15,822	\$ 778,047
July 2013 (as adjusted)	December 2012	11,291	\$ 562,289

SC PSC Docket No. 2011-406-C
Exhibit KEM-3

SUPPORT THAT SHOULD HAVE BEEN REQUESTED AND GRANTED
(CORRECTED BASED ON STATISTICALLY-VALID RANDOM SAMPLING)

Date of Request	Data Month	Grandfathered Stand-Alone Basic	
		Residential Lines*	Support*
September 2011	July 2011	16,183	\$ 790,902
July 2012	December 2011	14,344	\$ 705,377
July 2013 (as adjusted)	December 2012	10,236	\$ 509,772

* These figures represent a 9.34% reduction of the figures in Exhibit KEM-2.

SC PSC Docket No. 2011-406-C
Exhibit KEM-4

AGGREGATE AMOUNT OF OVERAGE IN STATE USF SUPPORT
THAT HAS BEEN GRANTED TO AT&T SOUTH CAROLINA SINCE 2011

Date of Request	Data Month	Support		Corrected		Overage
		Granted		Support		
September 2011	July 2011	\$ 1,112,111	\$	790,902	\$	321,210
July 2012	December 2011	\$ 973,542	\$	705,377	\$	268,165
July 2013 (as adjusted)	December 2012	\$ 628,749	\$	509,772	\$	118,977
Aggregate Overage						\$ 708,352

SC PSC Docket No. 2011-406-C
Exhibit KEM-5

**AT&T REQUESTS AND SUPPORT GRANTED
FOR GRANDFATHERED STAND-ALONE BASIC RESIDENTIAL LINES**

Cumulative "Overage" Granted	\$	708,352
Less Amounts Granted But Not Yet Received	\$	419,166 *
Overage in Support Received	\$	289,186

* \$628,749 of State USF support granted in Commission Order
2013-822 less \$209,583 of that amount that AT&T South
Carolina has received to date.

STATE OF Georgia)
COUNTY OF Cobb)

Before me, the undersigned authority, duly commissioned and qualified in and for the State and County aforesaid personally came and appeared Kenneth E. Minzenberger who, being by me first duly sworn, deposed and said that:

1. I, Kenneth E. Minzenberger, am Area Manager – Pubic Policy, AT&T Services, Inc.
2. I have read my foregoing pre-filed testimony in Docket No. 2011-406-C, which is dated June 10, 2014 and which consists of twelve pages and five exhibits.
3. The contents of my foregoing testimony are true to the best of my knowledge.

Kenneth E Minzenberger
AFFIANT

Sworn to and subscribed before me this 09 day of June, 2014.

[Signature]
NOTARY PUBLIC

My Commission Expires: 07/31/2014

[SEAL]



STATE OF SOUTH CAROLINA)
)
COUNTY OF RICHLAND) **CERTIFICATE OF SERVICE**

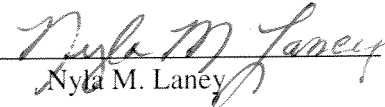
The undersigned, Nyla M. Laney, hereby certifies that she is employed by the Legal Department for BellSouth Telecommunications, LLC d/b/a AT&T South Carolina ("AT&T") and that she has caused AT&T South Carolina's Verified Direct Testimony of Kenneth E. Minzenberger in Docket No. 2011-406-C to be served upon the following on June 10, 2014:

Nanette S. Edwards
Counsel
Office of Regulatory Staff
1401 Main Street, Suite 900
Columbia, South Carolina 29201
(Electronic Mail)

F. David Butler, Esquire
Senior Counsel
S. C. Public Service Commission
Post Office Box 11649
Columbia, South Carolina 29211
(PSC Staff)
(Electronic Mail)

Joseph Melchers
General Counsel
S.C. Public Service Commission
Post Office Box 11649
Columbia, South Carolina 29211
(PSC Staff)
(Electronic Mail)

Jocelyn G. Boyd, Esquire
Chief Clerk
S. C. Public Service Commission
Post Office Box 11649
Columbia, South Carolina 29211
(PSC Staff)
(Electronic Mail)


Nyla M. Laney

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AT&T SOUTH CAROLINA'S
VERIFIED DIRECT TESTIMONY OF W. JOSEPH BLOUNT
BEFORE THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2011-406-C
JUNE 10, 2014

Q. PLEASE STATE YOUR NAME, YOUR EMPLOYER, AND YOUR
BUSINESS ADDRESS.

A. My name is W. Joseph Blount, and I am employed by AT&T Services, Inc. as
Director of Network Process and Quality. My business address is 2315 Salem
Road SE, Room 2C111, Conyers, Georgia 30013.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. My testimony provides support for the statement, on or about page 9 of the
verified Direct Testimony of AT&T South Carolina witness Ken Minzenberger,
that "AT&T South Carolina is 95% confident that if it had manually reviewed the
2009 billing records for all 17,850 lines identified in the manual review of the
July 2011 query results, the actual error rate would have been between 5.52% and
9.34%."

1 Q. PLEASE DESCRIBE YOUR BACKGROUND AND QUALIFICATIONS FOR
2 PROVIDING SUPPORT FOR THAT STATEMENT.

3

4 A. I have a Master's of Applied Mathematical Sciences degree from the University
5 of Georgia and a Master's of Science in Industrial Engineering degree from
6 Southern Polytechnic State University. I have over 25 years of experience in data
7 analytics, market research and statistical consulting. I have taught over 50
8 Statistical Process Control classes within AT&T/BellSouth and have trained
9 hundreds of internal auditors on scientific sampling techniques.

10

11 Q. WHAT WAS YOUR INVOLVEMENT IN THE SAMPLING PROCESS MR.
12 MINZENBERGER DESCRIBES IN HIS DIRECT TESTIMONY.

13

14 A. I consulted with AT&T's business units to ensure that the lines in the sample
15 described in Mr. Minzenberger's testimony were selected randomly, to determine
16 the appropriate sample size, and to estimate the actual error rate with a 95% (plus
17 or minus 2%) confidence level.

18

19 Q. HOW DID AT&T ENSURE THAT THE LINES IN THE SAMPLE WERE
20 SELECTED RANDOMLY?

21

22 A. AT&T assigned a computer generated random number to each of the 17,850 lines,
23 sorted the lines by the assigned random numbers, and reviewed the first 700 lines

1 (which, as explained below, is an appropriate sample size) on the sorted list. This
2 method is a standard, reliable method of ensuring a randomly-selected scientific
3 sample.

4
5 Q. HOW DID AT&T DETERMINE AN APPROPRIATE SAMPLE SIZE?

6
7 A. Since the lines in the sample would be selected randomly (as described above), I
8 was able to use standard scientific sampling formulas and statistical methods to
9 determine an appropriate sample size.

10
11 Using an expected error rate, the universe size, and the desired precision (a 95%
12 confidence interval of plus or minus 2%) as inputs, I applied standard scientific
13 sampling formulas and statistical methods to calculate a sample size that would
14 achieve the desired 95% confidence interval (plus or minus 2%). That sample
15 size was 700.

16
17 AT&T then sampled 700 lines (which, as explained above, were selected
18 randomly) and provided the error rate from that sample.

19
20 That error rate from the sample of 700 was equal to or below the expected error
21 rate that I used to calculate the sample size, which means the sample size of 700
22 achieved the desired 95% confidence interval (plus or minus 2%).

1 Q. HOW DID YOU USE THE RESULTS OF THE SAMPLE TO DETERMINE
2 THE ESTIMATED ERROR RATE AT A 95% CONFIDENCE LEVEL?

3

4 A. Using the error rate attained by evaluating each of the randomly selected lines
5 (7.43%), as well as the sample size (700), universe size (17,850) and desired
6 precision (plus or minus 2%), I calculated the 95% confidence interval using
7 standard scientific sampling formulas.

8

9 Q. IN SUMMARY, WHAT ARE YOUR CONCLUSIONS?

10

11 A. Based on the foregoing, AT&T South Carolina is 95% confident that if it had
12 manually reviewed the 2009 billing records for all 17,850 lines identified in the
13 manual review of the July 2011 query results, the actual error rate would have
14 been between 5.52% and 9.34%.

15

16 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

17

18 A. Yes.

AFFIDAVIT

STATE OF Georgia)
)
COUNTY OF Walton)

Before me, the undersigned authority, duly commissioned and qualified in and for the State and County aforesaid personally came and appeared W. Joseph Blount who, being by me first duly sworn, deposed and said that:

1. I, W. Joseph Blount, am Director of Network Process and Quality, AT&T Services, Inc.
2. I have read my foregoing pre-filed testimony in Docket No. 2011-406-C, which is dated June 10, 2014 and which consists of four pages and no exhibits.
3. The contents of my foregoing testimony are true to the best of my knowledge.

W Joseph Blount
AFFIANT

Sworn to and subscribed before me this 10th day of June, 2014.

Pamela R. Bowers
NOTARY PUBLIC

My Commission Expires: July 10, 2016



STATE OF SOUTH CAROLINA)
) CERTIFICATE OF SERVICE
COUNTY OF RICHLAND)

The undersigned, Nyla M. Laney, hereby certifies that she is employed by the Legal Department for BellSouth Telecommunications, LLC d/b/a AT&T South Carolina (“AT&T”) and that she has caused AT&T South Carolina’s Verified Direct Testimony of W. Joseph Blount in Docket No. 2011-406-C to be served upon the following on June 10, 2014:

Nanette S. Edwards
Counsel
Office of Regulatory Staff
1401 Main Street, Suite 900
Columbia, South Carolina 29201
(Electronic Mail)

F. David Butler, Esquire
Senior Counsel
S. C. Public Service Commission
Post Office Box 11649
Columbia, South Carolina 29211
(PSC Staff)
(Electronic Mail)

Joseph Melchers
General Counsel
S.C. Public Service Commission
Post Office Box 11649
Columbia, South Carolina 29211
(PSC Staff)
(Electronic Mail)

Jocelyn G. Boyd, Esquire
Chief Clerk
S. C. Public Service Commission
Post Office Box 11649
Columbia, South Carolina 29211
(PSC Staff)
(Electronic Mail)

Nyla M. Laney
Nyla M. Laney

1 AT&T SOUTH CAROLINA'S
2 VERIFIED DIRECT TESTIMONY OF RONALD L. HILYER
3 BEFORE THE PUBLIC SERVICE COMMISSION
4 OF SOUTH CAROLINA
5 DOCKET NO. 2011-406-C
6 JUNE 10, 2014
7

8 Q. PLEASE STATE YOUR NAME, YOUR EMPLOYER, AND YOUR
9 BUSINESS ADDRESS.

10
11 A. My name is Ronald L. Hilyer and my business address is 675 West Peachtree N.
12 W., Atlanta, Georgia. I am employed by AT&T Services, Inc. as Director –
13 Accounting.

14
15 Q. PLEASE PROVIDE A BRIEF DESCRIPTION OF YOUR BACKGROUND
16 AND EXPERIENCE.

17
18 A. I received Bachelor and Master of Science degrees in accounting in 1981 and
19 1991, respectively, from the University of Alabama in Birmingham. I am a
20 Certified Public Accountant (CPA) licensed in the state of Alabama, and am a
21 member of the American Institute of CPAs and the Alabama Society of CPAs.
22 After approximately 4 years experience with Peat, Marwick, Mitchell and Co.
23 (presently known as KPMG), I was employed by BellSouth (now AT&T) in

1 September 1984 as an assistant manager in the Comptroller's Department in
2 Birmingham, Alabama. Since that time, I have held various positions of
3 increasing responsibility in the areas of tax, budget and forecast preparation and
4 regulatory matters. I was transferred to my current position in February 2000.

5
6 Q. WHAT ARE YOUR CURRENT RESPONSIBILITIES?

7
8 A. My responsibilities include supervision of various regulatory accounting and
9 reporting functions. Specifically, these responsibilities include the preparation
10 and filing of the Federal Lifeline claims with Universal Service Administrative
11 Company (USAC).

12
13 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

14
15 A. On June 10, 2014, AT&T South Carolina and the Office of Regulatory Staff
16 ("ORS") filed a Joint Proposal in this docket. My testimony supports those
17 aspects of the Joint Proposal that address Lifeline support AT&T South Carolina
18 has sought and received from the State Universal Service Fund ("State USF").

19
20 Q. WHAT REGULATORY FRAMEWORK APPLIES TO THE LIFELINE
21 SUPPORT AT&T SOUTH CAROLINA CAN RECEIVE FROM THE STATE
22 USF?

1 A. Section 58-9-576(C), under which AT&T South Carolina has been operating
2 since October 1, 2009. *See* AT&T South Carolina's Notice of Election to Operate
3 Pursuant to S.C. Code Ann. §58-9-576(C), Non-Docketed Item (September 23,
4 2009). Specifically, Section 58-9-576(C)(9)(d) allows AT&T South Carolina to
5 seek Lifeline support from the State USF.

6
7 Q. AS A PRACTICAL MATTER, HOW DOES AT&T SOUTH CAROLINA SEEK
8 AND RECEIVE LIFELINE SUPPORT FROM THE STATE USF?

9
10 A. Each July, AT&T South Carolina reports to the ORS (as administrator of the State
11 USF) the number of its lines that were eligible for Lifeline benefits as of the
12 previous December. That number forms the basis for the monthly Lifeline
13 support AT&T South Carolina receives from the State USF for the twelve-
14 monthly period beginning the following December. *See* Order Approving Final
15 Documents and Vacating Order No. 2001-954, *In Re Proceedings to Establish*
16 *Guidelines for an Intrastate Universal Service Fund*, Order No. 2001-996
17 (October 10, 2001), Exhibit B (State USF Administrative Procedures) at p. 9,
18 §VII.

19
20 Assume, for example, that on July 1, 2014, AT&T South Carolina reports that
21 10,000 of its lines were eligible for Lifeline benefits as of December 2013.¹

¹ These hypothetical numbers are chosen for mathematical simplicity and are not intended to reflect the actual numbers of lines AT&T South Carolina may report in July 2014.

1 AT&T South Carolina would receive \$35,000 per month (10,000 lines X \$3.50
2 state Lifeline credit amount) in Lifeline support from the State USF for the
3 months of December 2014 through November 2015.
4

5 Q. WHY IS LIFELINE SUPPORT BEING ADDRESSED IN THE JOINT
6 PROPOSAL?
7

8 A. Because AT&T South Carolina mistakenly overstated the number of its Lifeline-
9 eligible lines as of December 2012, which was used to determine the monthly
10 amount of Lifeline support to AT&T South Carolina from the State USF for the
11 twelve-month period beginning December 2013.
12

13 Q. PLEASE ELABORATE.
14

15 A. In 2012, the Federal Communications Commission (“FCC”) issued an Order that,
16 among other things, requires: all Lifeline subscribers to recertify annually their
17 continued eligibility for the Lifeline benefit; and Lifeline providers to report the
18 results of this annual recertification to the FCC and the Universal Service
19 Administrative Company (USAC).²
20

² See *Lifeline and Link Up Reform and Modernization et al.*, WC Docket No. 11-42 et al., Report and Order and Further Notice of Proposed Rulemaking, 27 FCC Rcd 6656, ¶¶ 129-48 (2012).

1 In the course of preparing these annual recertification reports, which are due at the
2 FCC and USAC at the end of each January, and responding to a USAC audit,
3 AT&T discovered some discrepancies with associated reimbursement forms it
4 previously had filed with USAC. Accordingly, AT&T delayed filing the annual
5 recertification reports with the FCC and USAC pending completion of an internal
6 review of its Lifeline subscriber base. Exhibit RLH-1 is a copy of the Request for
7 Extension of Time AT&T filed with the FCC.

8
9 AT&T has since filed revised reimbursement claims with USAC and on May 2,
10 2014, AT&T filed its annual recertification reports with the FCC and USAC
11 along with a letter explaining how it has adjusted for the fact that it is not
12 currently able to confirm that it has complete or current certifications of eligibility
13 for a number of subscribers.³ Exhibit RLH-2 is a copy of that letter.

14
15 Q. WHAT IS THE IMPACT OF THESE DEVELOPMENTS ON AT&T SOUTH
16 CAROLINA'S LIFELINE SUPPORT FROM THE STATE USF?

17
18 A. AT&T South Carolina mistakenly overstated, by approximately 5%, the number
19 of its Lifeline-eligible lines as of December 2012.

20

³ AT&T also provided a copy of this Letter and forms specific to South Carolina to the ORS.

1 Accordingly, for the four months from December 2013 through March 2014,
2 AT&T South Carolina has received a total of \$13,006 more in Lifeline support
3 from the State USF than it should have.

4
5 Additionally, for the eight months from April 2014 through November 2014,
6 AT&T South Carolina should receive a total of \$26,012 (or \$3,251.50 per month)
7 less than it otherwise would be entitled for Lifeline support from the State USF.

8
9 Q. IS THIS A CONTINUING ISSUE?

10
11 A. No. On May 14, 2014, at the joint request of AT&T South Carolina and the ORS,
12 the Commission issued a directive immediately suspending State USF payments
13 to AT&T South Carolina pending further order of the Commission.

14
15 Accordingly, if approved, the Joint Proposal will completely remedy the situation
16 I describe in my testimony.

17
18
19 Q. WHAT ACTIONS HAS AT&T TAKEN IN AN EFFORT TO ENSURE THAT
20 THIS ERROR DOES NOT RECUR?

21
22 A. In an effort to ensure that AT&T only seeks Lifeline reimbursement for eligible
23 subscribers going forward, it has developed and improved processes to enhance
24 internal controls around the qualification of subscribers for Lifeline service and

1 the retention and tracking of subscriber eligibility documentation. As part of
2 these processes, before enrolling a new customer in Lifeline, AT&T will run a
3 check with the National Lifeline Accountability Database (which was established
4 by the FCC and is administered by USAC) to ensure that subscribers are not
5 already receiving Lifeline credits from another carrier. Additionally, AT&T will
6 compare billing information for each Lifeline subscriber for the base reporting
7 month to a proprietary tracking system to match each account to its record of
8 subscriber eligibility documentation before seeking Lifeline support from the
9 State USF in the future.

10

11 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

12

13 A. Yes.

14

EXHIBIT RLH-1

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Lifeline and Link Up Reform and)	
Modernization)	WC Docket No. 11-42

REQUEST FOR EXTENSION OF TIME TO FILE FCC FORM 555

AT&T Services, Inc., on behalf of its wireline operating affiliates¹ (collectively, AT&T), respectfully requests a three week extension of the Commission's January 31, 2014, filing deadline for FCC Form 555. In February 2012, the Commission released an order making significant reforms to its low-income program.² Included among those reforms is a requirement that, beginning in 2012, all Lifeline subscribers recertify annually their continued eligibility for the Lifeline benefit.³ The Commission created a form in 2012, FCC Form 555, for Lifeline providers to use to report the results of this annual recertification, which is either performed by the provider, a state entity or the Universal Service Administrative Company (USAC).⁴ On this

¹ The specific affiliates included in this request are BellSouth Telecommunications, LLC; Illinois Bell Telephone Company; Indiana Bell Telephone Company, Inc.; Michigan Bell Telephone Company; Nevada Bell Telephone Company; Southwestern Bell Telephone Company; The Ohio Bell Telephone Company; The Southern New England Telephone Co.; and Wisconsin Bell, Inc. No other AT&T operating affiliate that participates in the Commission's Lifeline program is covered by this request.

² *Lifeline and Link Up Reform and Modernization et al.*, WC Docket No. 11-42 et al., Report and Order and Further Notice of Proposed Rulemaking, 27 FCC Rcd 6656 (2012).

³ *Id.* at ¶¶ 129-48.

⁴ See FCC Form 555, Annual Lifeline Eligible Telecommunications Carrier Certification Form (December 2013), available at <http://www.usac.org/res/documents/li/pdf/forms/2013-FCC-form-555.pdf>.

form, a provider is required to report the number of subscribers claimed on its February FCC Form 497⁵ of the current FCC Form 555 calendar year, as well as details on the number of Lifeline customers the provider (or a state entity or USAC) attempted to recertify and the results of that effort.⁶ This form also requires certification by an officer of the company.

AT&T completed last year's Lifeline recertification process and has prepared the results from that effort. Unfortunately, it is unable at this time to report these results on FCC Form 555. This year, providers are to report the number of Lifeline subscribers claimed on their February 2013 FCC Form 497 filings.⁷ AT&T is currently in the process of revising its FCC Forms 497, including its February 2013 FCC Forms 497, and, as a result, cannot populate this column of FCC Form 555 (or other columns of this form that incorporate the February 2013 figures) until those revisions are complete. AT&T is making these revisions because it learned last month of some discrepancies with its FCC Forms 497. AT&T is working diligently to resolve these discrepancies and file revised FCC Forms 497.

AT&T understands that the Commission and USAC use providers' FCC Form 555 submissions to report, for example, industrywide results of the annual recertification process.⁸ To minimize any inconvenience that AT&T's brief filing delay might cause Commission staff and USAC, we attach the results of the 2013 recertification effort for AT&T's affiliates

⁵ FCC Form 497 is the Lifeline worksheet that providers use to report the number of Lifeline subscribers that received Lifeline benefits in a particular month. See FCC Form 497, Lifeline Worksheet (April 2012 Edition), available at http://www.usac.org/_res/documents/li/pdf/forms/FCC-form-497-082012.pdf.

⁶ See FCC Form 555, Section 2.

⁷ *Id.* Section 2, Column A.

⁸ *Wireline Competition Bureau Announces Results of the 2012 Annual Lifeline Recertification Process*, WC Docket No. 11-42, Public Notice, DA 13-872 (rel. April 25, 2013).

mentioned above in footnote 1. To enable Commission staff and USAC to obtain a reasonable estimate of the percentage of subscribers AT&T de-enrolled in 2013, we provide the number of subscribers originally claimed by these affiliates on their FCC Forms 497 in February 2013 but we note that these figures soon will be revised downward by some amount.

Accurate recertification reporting is essential for the Commission to evaluate the effectiveness of its recertification requirements. For that reason, we request that the Commission grant an extension of time to submit these reports to allow AT&T to report accurate figures and make the requisite certifications, it requires a brief extension of the filing deadline until no later than February 21, 2014. AT&T respectfully requests that the Wireline Competition Bureau grant AT&T its requested extension.

Respectfully Submitted,

/s/ Cathy Carpino
Cathy Carpino
Gary L. Phillips
Lori Fink

AT&T Services, Inc.
1120 20th Street NW
Suite 1000
Washington, D.C. 20036
(202) 457-3046 – phone
(202) 457-3073 – facsimile

January 30, 2014

Attorneys for AT&T

ATTACHMENT

Carrier	Column A*	Column B	Column C**	Column D	Column E	Column F	Column G	Column H	Column I	Column M*	Column N	Column O	Column P	Column Q*
AT&T AL	8,561	6,454	0	7,681	4,784	2,897	0	2,897	0	8,561	2,897	0	2,897	34
AT&T AR	7,539	252	446	5,704	3,915	1,798	0	1,798	1,835	7,539	1,798	0	1,798	24
AT&T CT	10,579	0	1,076	10,088	6,322	3,766	0	3,766	491	10,579	3,766	0	3,766	36
AT&T FL	39,430	1,466	2,679	30,880	18,184	12,696	0	12,696	0	39,430	12,696	0	12,696	32
AT&T GA	19,032	13,417	803	18,383	9,931	8,452	0	8,452	0	19,032	8,452	0	8,452	44
AT&T IL	21,164	0	1,640	17,979	12,128	5,851	0	5,851	1,494	21,164	5,851	0	5,851	28
AT&T IN	10,660	189	766	8,493	5,689	2,804	0	2,804	1,063	10,660	2,804	0	2,804	26
AT&T KS	10,909	855	344	10,188	6,271	3,917	0	3,917	0	10,909	3,917	0	3,917	36
AT&T KY	6,589	2,146	242	6,413	4,423	1,990	0	1,990	0	6,589	1,990	0	1,990	30
AT&T LA	7,199	5,600	357	7,321	4,370	2,951	0	2,951	0	7,199	2,951	0	2,951	41
AT&T MI	22,245	617	520	19,168	13,020	6,148	0	6,148	1,671	22,245	6,148	0	6,148	28
AT&T MO	21,630	183	850	22,369	12,674	9,695	0	9,695	0	21,630	9,695	0	9,695	45
AT&T MS	10,433	8,601	436	10,181	6,404	3,777	0	3,777	0	10,433	3,777	0	3,777	36
AT&T NC	10,611	3,469	743	9,506	5,862	3,644	0	3,644	0	10,611	3,644	0	3,644	34
AT&T NV	9,031	0	236	5,298	2,681	2,617	0	2,617	3,733	9,031	2,617	0	2,617	29
AT&T OH	57,368	362	4,107	48,033	32,152	15,881	0	15,881	5,571	57,368	15,881	0	15,881	28
AT&T OK	17,988	16	1,017	13,813	10,080	3,733	0	3,733	4,175	17,988	3,733	0	3,733	21
AT&T SC	7,288	10,096	302	7,365	4,623	2,742	0	2,742	0	7,288	2,742	0	2,742	38
AT&T TN	16,172	6,742	670	15,311	10,018	5,293	0	5,293	0	16,172	5,293	0	5,293	33
AT&T WI	11,119	27	910	9,062	6,069	2,993	0	2,993	844	11,119	2,993	0	2,993	27

* = Figure will change

** = Figure may change

Note: Please see next page for Column Description Key

Column Description Key

- A = Subscribers Claimed on February FCC Form(s) 497 of current Form 555 calendar year
- B = Lines Claimed on February FCC Form(s) 497 of current Form 555 calendar year provided to Wireline Resellers
- C = Subscribers Claimed on the February FCC Form(s) 497 that were initially enrolled in current Form 555 calendar year
- D = Subscribers ETC Contracted Directly to Recertify Eligibility Through Attestation
- E = Subscribers Responding to ETC Contact
- F = Non-Responding Subscribers
- G = Subscribers Responding that They Are No Longer Eligible
- H = Subscribers De-Enrolled or Scheduled to be De-Enrolled as a Result of Non-Response or Ineligibility
- I = Subscribers Who De-Enrolled Prior to Recertification Attempt
- Columns J, K, L are not applicable
- M = Subscribers Claimed on February FCC Form(s) 497
- N = Subscribers De-Enrolled or Scheduled to be De-Enrolled as a Result of Non-Response or Ineligibility
- O = Subscribers De-Enrolled or Scheduled to be De-Enrolled as a Result of a Finding of Ineligibility
- P = Total Subscribers De-Enrolled or Scheduled to be De-Enrolled
- Q = Percentage of Subscribers De-Enrolled or Scheduled to be De-Enrolled that were claimed on the February FCC Form(s) 497

EXHIBIT RLH-2



Anisa A. Latif
Associate Director
Federal Regulatory

AT&T Services, Inc.
1120 20th Street, N.W.,
Suite 1000
Washington, D.C. 20036

202.457.3068 Phone
202.457.3071 Fax
al7161@att.com E-mail

May 2, 2014

Via Electronic Submission:

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Room TW-A325
Washington, D.C. 20554

Via Hand Delivery:

Ms. Karen Majcher
VP – High Cost and Low Income
Universal Service Administrative Company
2000 L Street, NW
Suite 200
Washington, D.C. 20036

**Re: *In the Matter of Lifeline and Link Up Reform and Modernization, WC*
Docket No. 11-42; FCC Forms 555 for BellSouth Telecommunications,
LLC.**

Dear Ms. Dortch and Ms. Majcher:

Attached to the accompanying cover letter, please find the 2014 FCC Forms 555 for BellSouth Telecommunications, LLC.

Please contact me if you have any questions.

Sincerely,

/s/ Anisa Latif

Anisa Latif

Attachments

Cc: Suzanne Tetreault
Radhika Karmarkar



Mel Coker
Chief Marketing Officer – Home Solutions
208 South Akard Street, Suite 3516
Dallas, Texas 75202
214-757-5860 Office

May 2, 2014

Marlene Dortch
Secretary
Federal Communications Commission
445 12th St., SW
Washington, DC 20554

**Re: Lifeline and Link Up Reform and Modernization, WC Docket No. 11-42;
Copies of FCC Forms 555 for BellSouth Telecommunications, LLC**

Dear Ms. Dortch:

Please find enclosed the 2014 FCC Forms 555 for each of the nine states where BellSouth Telecommunications, LLC (“BellSouth”) is an eligible telecommunications carrier (“ETC”).¹

As representatives of BellSouth have explained to senior USAC and FCC Wireline Competition Bureau staff in separate discussions, BellSouth commenced an internal review of its Lifeline subscriber base at the beginning of the year. During the course of that review, BellSouth reviewed Lifeline subscriber documentation for each of the nine states where it is an ETC. BellSouth has identified a small fraction of subscribers for which it currently is not able to confirm that it has complete or current certifications of eligibility. Specifically, BellSouth identified an error rate of 0.8% out of a statistically valid sample, with a 95% confidence level that the error rate in the total population would be between 0.4% and 1.2%. As a result of this review, BellSouth has reduced retroactively the number of retail subscribers for whom it is seeking Lifeline reimbursement by the high end of this range, 1.2%.

It was BellSouth’s preference to provide the explanation in the preceding paragraph on the Form 555 itself. However, I understand that USAC will not accept FCC- and OMB-approved forms that have been modified in any way by third parties without written approval from the FCC and, instead, USAC indicated that BellSouth could provide this information in a cover letter. I further understand that BellSouth’s representatives were not successful in their efforts to have the FCC provide USAC such written approval so that BellSouth could provide the information about its *de minimis* error rate and its decision to seek less reimbursement on the Form 555 itself but that

¹ BellSouth does business in each of the nine states under a different name, as follows: AT&T Alabama (SAC 255181), AT&T Florida (SAC 215191), AT&T Georgia (SAC 225192), AT&T Kentucky (SAC 265182), AT&T Louisiana (SAC 275183), AT&T Mississippi (SAC 285184), AT&T North Carolina (235193), AT&T South Carolina (245194), and AT&T Tennessee (SAC 295185).

Marlene Dortch

May 2, 2014

Page 2

FCC staff had no objection to BellSouth providing the information in a cover letter. Consequently, BellSouth is providing this information in a cover letter.

Please do not hesitate to contact me immediately if you have any questions about the information provided in this cover letter or if you desire any further information.

Very truly yours,

A handwritten signature in cursive script that reads "Mel Coker".

Mel Coker

AFFIDAVIT

STATE OF Georgia)
)
COUNTY OF Fulton)

Before me, the undersigned authority, duly commissioned and qualified in and for the State and County aforesaid personally came and appeared Ronald L. Hilyer who, being by me first duly sworn, deposed and said that:

1. I, Ronald L. Hilyer, am Director – Accounting, AT&T Services, Inc.
2. I have read my foregoing pre-filed testimony in Docket No. 2011-406-C, which is dated June 10, 2014 and which consists of seven pages and two exhibits.
3. The contents of my foregoing testimony are true to the best of my knowledge.

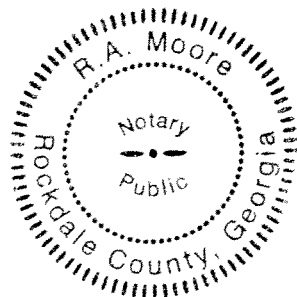
Ronald L. Hilyer
AFFIANT

Sworn to and subscribed before me this 10th day of June, 2014.

R. A. Moore
NOTARY PUBLIC

My Commission Expires: Dec. 13, 2014

[SEAL]



CERTIFICATE OF SERVICE

The undersigned, Nyla M. Laney, hereby certifies that she is employed by the Legal Department for BellSouth Telecommunications, LLC d/b/a AT&T South Carolina (“AT&T”) and that she has caused AT&T South Carolina’s Verified Direct Testimony of Ronald L. Hilyer in Docket No. 2011-406-C to be served upon the following on June 10, 2014:

Nanette S. Edwards
Counsel
Office of Regulatory Staff
1401 Main Street, Suite 900
Columbia, South Carolina 29201
(Electronic Mail)

F. David Butler, Esquire
Senior Counsel
S. C. Public Service Commission
Post Office Box 11649
Columbia, South Carolina 29211
(PSC Staff)
(Electronic Mail)

Joseph Melchers
General Counsel
S.C. Public Service Commission
Post Office Box 11649
Columbia, South Carolina 29211
(PSC Staff)
(Electronic Mail)

Jocelyn G. Boyd, Esquire
Chief Clerk
S. C. Public Service Commission
Post Office Box 11649
Columbia, South Carolina 29211
(PSC Staff)
(Electronic Mail)

Nyla M. Laney
Nyla M. Laney